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Attorneys for Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Commodity Futures Trading Commission,

Plaintiff,

v.

Traders Global Group Inc., a New Jersey
corporation, d/b/a “My Forex Funds”;
Traders Global Group Inc., a Canadian
business organization; and Murtuza Kazmi,

Defendants.

Case No.: 3:23-cv-11808

**DECLARATION OF DAKOTA
SPEAS IN OPPOSITION TO
PLAINTIFF’S *EX PARTE* MOTION
FOR STATUTORY RESTRAINING
ORDER AND PRELIMINARY
INJUNCTION**

I, Dakota Speas, declare pursuant to 28 U.S.C. § 1746 that:

1. I am a member in good standing of the bar of the State of California and an associate at Quinn Emanuel Urquhart & Sullivan, LLP (“Quinn Emanuel”). I was admitted *pro hac vice* in this case on September 18, 2023 (ECF 39). I am one of the attorneys representing Defendants Traders Global Group Incorporated, a New Jersey corporation doing business as “My Forex Funds,” Traders Global Group Incorporated, a Canadian business organization, and Murtuza Kazmi (collectively, “Defendants”). I make this declaration upon facts known to me or upon information and belief, to the best of my knowledge.

2. Attached as **Exhibit A** is a true and correct copy of a letter dated June 8, 2021 from Gowling WLG (Canada) LLP to the Ontario Securities Commission (“OSC”), enclosing a standard independent contractor agreement.

3. Attached as **Exhibit B** is a true and correct screenshot of the homepage of Hydra Trading’s website, available at <https://www.hydrafunding.io/>.

4. Attached as **Exhibit C** is a true and correct copy of the homepage of Maven Trading’s website, available at <https://maventrading.com/>.

5. Attached as **Exhibit D** is a true and correct copy of the “Why join My Forex Funds?” page from the My Forex Funds website screen-captured on August 2, 2023, available at <https://web.archive.org/web/20230802181627/https://myforexfunds.com/faq/why-join-my-forex-funds/>.

6. Attached as **Exhibit E** is a true and correct copy of the “My Forex Funds Magazine” page from the My Forex Funds website screen-captured on June 29, 2023, available at <https://web.archive.org/web/20230629151944/https://myforexfunds.com/trading-magazine/>.

7. Attached as **Exhibit F** is a true and correct copy of the June 2023 edition, Volume 1, of MyForexMagazine screen-captured on June 23, 2023, available at

<https://web.archive.org/web/20230629152139/https://myforexfunds.com/wp-content/uploads/2023/06/MFF-MAGAZINE-June-2023.pdf>.

8. Attached as **Exhibit G** is a true and correct copy of the July 27, 2023 blog post by My Forex Funds titled “5 Major Mistakes Forex Traders make and how to avoid them” screen-captured on August 2, 2023, available at

<https://web.archive.org/web/20230802222050/https://myforexfunds.com/5-major-mistakes-forex-traders-make-and-how-to-avoid-them/>.

9. Attached as **Exhibit H** is a true and correct copy of the “Trading Tips” page from the My Forex Funds website screen-captured on August 23, 2022, available at

<https://web.archive.org/web/20230823073335/https://myforexfunds.com/tag/trading-tips/>.

10. Attached as **Exhibit I** is a true and correct copy of the April 12, 2022 blog post by My Forex Funds titled “True Market conditions, Metatrader, Arbitrage and More!” screen-captured on August 23, 2023, available at

<https://web.archive.org/web/20230823081940/https://myforexfunds.com/true-market-conditions-metatrader-arbitrage-and-more/>.

11. Attached as **Exhibit J** is a true and correct copy of the “FAQs” page from Maven Trading’s website, available at <https://maventrading.com/faqs/>.

12. Attached as **Exhibit K** is a true and correct copy of the July 15, 2022 blog post by My Forex Funds titled “Slippage – how to minimize or avoid it” screen-captured on August 23, 2022, available at *[see next page]*

<https://web.archive.org/web/20230823082015/https://myforexfunds.com/slippage-how-to-minimize-or-avoid-it/>.

13. Attached as **Exhibit L** is a true and correct screenshot of a webpage titled “B-Book: How Forex Brokers Manage Their Risk,” available at <https://www.babypips.com/learn/forex/b-book-forex-brokers>.

14. Attached as **Exhibit M** is a true and correct screenshot of the “How It Works” page from the Billions Club website, available at <https://www.billionsclub.com/how-it-works>.

15. Attached as **Exhibit N** is a true and correct copy of the homepage of My Forex Funds’s website screen-captured on September 26, 2023, available at <https://web.archive.org/web/20230926103711/http://www.myforexfunds.com/>.

16. Attached as **Exhibit O** is a true and correct screenshot of the homepage of SurgeTrader’s website, available at <https://surgetrader.com/>.

17. Attached as **Exhibit P** is a true and correct copy of an email dated May 19, 2022 from Gowling WLG (Canada) LLP to the Ontario Securities Commission.

18. Attached as **Exhibit Q** is a true and correct copy of a letter dated November 30, 2022 from Gowling WLG (Canada) LLP to the Ontario Securities Commission.

19. I declare under the penalty of perjury under the laws of the United States of America that the foregoing statements are true and correct, to the best of my knowledge, and that I executed this declaration in Los Angeles, California on this 31st day of October, 2023.



Dakota Speas